

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING)	
PHARMACY, INC. PRODUCTS LIABILITY)	MDL No. 02419
LITIGATION)	Docket No. 1:13-md-2419-RWZ
_____)	
)	
This document relates to:)	
)	
All of the cases against the Box Hill Defendants)	
)	

**THE BOX HILL DEFENDANTS' FIRST SET OF INTERROGATORIES,
REQUESTS FOR PRODUCTION OF DOCUMENTS AND REQUESTS
FOR ADMISSION PROPOUNDED TO LIBERTY INDUSTRIES, INC.**

Come the Defendants Box Hill Surgery Center, L.L.C., Ritu T. Bhambhani, M.D., and Ritu T. Bhambhani, M.D., L.L.C. (collectively "Box Hill Defendants"), pursuant to Rules 26, 33, and 34 of the Federal rules of Civil Procedure and the Local Rules for the District of Massachusetts, and propound the following Interrogatories, Requests for Production of Documents and Requests for Admission to Liberty Industries, Inc. ("Liberty").

On March 9, 2015, the Saint Thomas Entities served their *First Set of Interrogatories, Requests for Production, and Requests for Admission on Liberty*. In order to minimize the impact on Liberty created by having to respond to multiple sets of discovery, the Box Hill Defendants hereby adopt and incorporate the setoff discovery served by the Saint Thomas Entities.

INSTRUCTIONS AND DEFINITIONS

The Box Hill Defendants adopt and incorporate as if stated fully herein the preamble and "Instructions and Definitions" sections of the Saint Thomas Entities' First Set of Interrogatories, Requests for Production and Requests for Admission to Liberty.

**INTERROGATORIES ADOPTED AND INCORPORATED FROM
DISCOVERY SENT BY SAINT THOMAS ENTITIES**

In order to minimize the impact of discovery on Liberty, these Box Hill Defendants **hereby adopt and incorporate, as if stated fully herein, Interrogatories 1-10** from the *Saint Thomas Entities' First Set of Interrogatories to Liberty*.

1-10. [The Box Hill Defendants adopt and incorporate, as if stated fully herein, Interrogatories 1-10 from the *Saint Thomas Entities' First Set of Interrogatories to Liberty*.]

ANSWER:

**REQUESTS FOR PRODUCTION ADOPTED AND INCORPORATED
FROM DISCOVERY SENT BY SAINT THOMAS ENTITIES**

In order to minimize the impact of discovery on Liberty, these Box Hill Defendants **hereby adopt and incorporate, as if stated fully herein, Requests for Production 1-33** from the *Saint Thomas Entities' First Set of Requests for Production to Liberty*.

1-33. [The Box Hill Defendants adopt and incorporate, as if stated fully herein, Requests for Production 1-33 from the *Saint Thomas Entities' First Set of Requests for Production to Liberty*.]

ANSWER:

**REQUESTS FOR ADMISSION ADOPTED AND INCORPORATED
FROM DISCOVERY SENT BY SAINT THOMAS ENTITIES**

In order to minimize the impact of discovery on Liberty, these Box Hill Defendants **hereby adopt and incorporate, as if stated fully herein, Requests for Admission 1-18** from the *Saint Thomas Entities' First Set of Requests for Admission to Liberty*.

1-18. [The Box Hill Defendants adopt and incorporate, as if stated fully herein, Requests for Admission 1-18 from the *Saint Thomas Entities' First Set of Requests for Admission to Liberty*.]

RESPONSE:

Respectfully submitted,

/s/ Gregory K. Kirby

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Interrogatories, Requests for Production of Documents, and Requests for Admission has been served on the below listed counsel for Liberty Industries on July 30, 2015 via U.S. Mail, postage pre-paid. Thereafter, a copy was filed on the Court's CM/ECF system to ensure that all interested parties can access it.

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Counsel for Liberty Industries, Inc.

/s/ Gregory K. Kirby

Gregory K. Kirby